

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS TEACHER RETIREMENT  
SYSTEM,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
ALLIANZ GLOBAL INVESTORS U.S.  
HOLDINGS LLC, ALLIANZ SE, ALLIANZ  
ASSET MANAGEMENT GMBH, ALLIANZ OF  
AMERICA, INC., ALLIANZ ASSET  
MANAGEMENT OF AMERICA HOLDINGS  
INC., ALLIANZ ASSET MANAGEMENT OF  
AMERICA LLC, ALLIANZ ASSET  
MANAGEMENT OF AMERICA LP, AND PFP  
HOLDINGS INC.,

Defendants.

Case No. 1:20-cv-5615-KPF

(caption continues on following  
pages)

**MEMO ENDORSED**

**STIPULATION AND CIVIL CASE MANAGEMENT PLAN #4**

RETIREMENT PROGRAM FOR EMPLOYEES OF  
THE TOWN OF FAIRFIELD, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 5817 (KPF)

LEHIGH UNIVERSITY,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 7061 (KPF)

TEAMSTER MEMBERS RETIREMENT PLAN,  
*et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 7154 (KPF)

BLUE CROSS AND BLUE SHIELD ASSOCIATION  
NATIONAL EMPLOYEE BENEFITS COMMITTEE,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 7606 (KPF)

METROPOLITAN TRANSPORTATION  
AUTHORITY DEFINED BENEFIT PENSION PLAN  
MASTER TRUST, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 7842 (KPF)

CHICAGO AREA I.B. OF T. PENSION PLAN &  
TRUST, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
*et al.*,

Defendants.

No. 20 Civ. 7952 (KPF)

THE EMPLOYES' RETIREMENT SYSTEM OF THE  
CITY OF MILWAUKEE,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 8642 (KPF)

CHICAGO & VICINITY LABORERS DISTRICT  
COUNCIL PENSION FUND AND CHICAGO &  
VICINITY LABORERS DISTRICT COUNCIL  
HEALTH & WELFARE FUND, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9478 (KPF)

THE BOARDS OF TRUSTEES FOR THE  
CARPENTERS HEALTH AND SECURITY TRUST  
OF WESTERN WASHINGTON AND FOR THE  
GROUP INVESTMENT TRUST OF THE  
CARPENTERS INDIVIDUAL ACCOUNT PENSION  
TRUST OF WESTERN WASHINGTON, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9479 (KPF)

UNITED FOOD & COMMERCIAL WORKERS  
UNIONS & EMPLOYERS MIDWEST PENSION  
FUND, AND ITS TRUSTEES,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 9587 (KPF)

BOARD OF TRUSTEES OF THE INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,  
LOCAL NO. 38 PENSION FUND PENSION PLAN,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 20 Civ. 10028 (KPF)

BLUE CROSS AND BLUE SHIELD ASSOCIATION,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

Defendant.

No. 20 Civ. 10848 (KPF)

MARCO CONSULTING GROUP TRUST I, by and  
through its directed trustee, The Bank of New York  
Mellon,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 21 Civ. 401 (KPF)

UNIVERSITY HEALTH, INC., SOUTHEAST  
GEORGIA HEALTH SYSTEM, INC., UNIVERSITY  
MEDICAL ASSOCIATES OF THE MEDICAL  
UNIVERSITY OF SOUTH CAROLINA (D/B/A  
MUSC PHYSICIANS), VIZIENT SOUTHERN  
STATES, INC., PHOENIX HEALTH CARE  
MANAGEMENT SERVICES, INC., AND HALIFAX  
REGIONAL MEDICAL CENTER EMPLOYEES'  
PENSION PLAN,

Plaintiffs,

V.

ALLIANZ GLOBAL INVESTORS U.S. LLC,  
ALLIANZ GLOBAL INVESTORS DISTRIBUTORS  
LLC, AND ALLIANZ SE,

Defendants.

No. 21 Civ. 1485 (KPF)

ALASKA LABORERS-EMPLOYERS RETIREMENT  
FUND, *et al.*,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, *et al.*,

Defendants.

No. 21 Civ. 1879 (KPF)

RAYTHEON TECHNOLOGIES CORPORATION  
PENSION ADMINISTRATION AND INVESTMENT  
COMMITTEE,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

Defendant.

No. 21 Civ. 3116 (KPF)

FINANCE COMMITTEE OF THE BOARD OF  
DIRECTORS OF BLUE CROSS BLUE SHIELD OF  
MICHIGAN and BLUE CROSS BLUE SHIELD OF  
MICHIGAN FOUNDATION,

Plaintiffs,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,

No. 21 Civ. 3276 (KPF)

Defendant.	
<p>TEXAS TREASURY SAFEKEEPING TRUST COMPANY,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC, ALLIANZ GLOBAL INVESTORS U.S. HOLDINGS LLC, ALLIANZ SE, ALLIANZ ASSET MANAGEMENT GMBH, ALLIANZ OF AMERICA, INC., ALLIANZ ASSET MANAGEMENT OF AMERICA HOLDINGS INC., ALLIANZ ASSET MANAGEMENT OF AMERICA LLC, ALLIANZ ASSET MANAGEMENT OF AMERICA LP, and PFP HOLDINGS INC.,</p> <p>Defendants.</p>	No. 21 Civ. 6074 (KPF)
<p>CHRISTIAN BROTHERS EMPLOYEE RETIREMENT PLAN, and DAN STREMEL, in his capacity as Chairperson of the Pension Board,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC, ALLIANZ GLOBAL INVESTORS U.S. HOLDINGS LLC, ALLIANZ SE, ALLIANZ ASSET MANAGEMENT GMBH, ALLIANZ OF AMERICA, INC., ALLIANZ ASSET MANAGEMENT OF AMERICA HOLDINGS INC., ALLIANZ ASSET MANAGEMENT OF AMERICA LLC, ALLIANZ ASSET MANAGEMENT OF AMERICA LP, AND PFP HOLDINGS INC.,</p> <p>Defendants.</p>	No. 21 Civ. 7388 (KPF)
<p>BOARD OF TRUSTEES OF THE SAN DIEGO COUNTY CONSTRUCTION LABORERS' PENSION TRUST FUND,</p> <p>Plaintiff,</p> <p>v.</p> <p>ALLIANZ GLOBAL INVESTORS U.S. LLC,</p> <p>Defendant.</p>	No. 21 Civ. 7898 (KPF)

The parties (“Parties”) to the above-referenced actions (the “Related Actions”) by and through their respective undersigned counsel, and subject to this Court’s approval, agree and stipulate as follows:

WHEREAS, on December 7, 2020, the Court entered Civil Case Management Plan #1 in *Arkansas Teacher Retirement System v. Allianz Global Investors US LLC et al.*, No. 20-cv-05615 (“ATRS Action”), ECF No. 65 (“Plan #1”), and certain other Related Actions;

WHEREAS, on November 1, 2021, the Court entered Civil Case Management Plan #2 in the Related Actions, *see, e.g.*, ATRS Action, ECF No. 108 (“Plan #2”);

WHEREAS, on December 20, 2021, the Court entered Civil Case Management Plan #3 in the Related Actions, *see, e.g.*, ATRS Action, ECF No. 112 (“Plan #3”);

WHEREAS, Plans #2 and #3 set forth a schedule for the filing of amended complaints, any further motions to dismiss, and responsive pleadings in the Related Actions, and Plan #1 otherwise remained in effect; and

WHEREAS, the Parties have agreed to extend certain deadlines under Plan #3,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties as follows:

1. Plan #3 is amended and superseded as follows:

#### **CIVIL CASE MANAGEMENT PLAN #4**

This Civil Case Management Plan (“Plan #4”) is submitted by the parties in each of the above-captioned related cases (together, the “Related Actions”) in accordance with the Court’s September 30, 2021 order and the October 30, 2021 Joint Status Report.

Plan #4 supplements Civil Case Management Plan #1 (“Plan #1”) (1:20-cv-5615-KPF, ECF No. 65), Civil Case Management Plan #2 (1:20-cv-5615-KPF, ECF No. 108), and Civil Case Management Plan #3 (1:20-cv-5615-KPF, ECF No. 112), which remain operative except as provided for herein. Capitalized terms not defined herein have the meaning set forth in Plan #1.

**7.3 Motions to Dismiss Later-Filed Related Actions and Amended Complaints.** Plan #3, ¶ 7.2 is vacated.

In those pending Related Actions filed after December 3, 2020 (“Later-Filed Related Actions”) that were not subject to AllianzGI US’s February 25, 2021 motion to dismiss (1:20-cv-5615-KPF, ECF No. 82) (“First-Round Motion to Dismiss”) decided by the Court on September 30, 2021 (1:20-cv-5615-KPF, ECF No. 106) (“September 30 Order”), AllianzGI US or Allianz Global Investors Distributors LLC (together, “AllianzGI Defendants”) informed Plaintiffs in writing of the grounds on which AllianzGI Defendants intend to move to dismiss, on November 22, 2021. To the extent no amended complaint is filed in any Later-Filed Related Action pursuant to Paragraph 8.3 and AllianzGI Defendants’ grounds for dismissal remain unchanged from their November 22, 2021 writing, the Court’s pre-motion letter practice for such Later-Filed Related Action is suspended.

Aon may file a motion to dismiss only if the complaint in BCBS (1:20-cv-7606-KPF) is amended to assert new claims against Aon. AllianzGI US may file a motion to dismiss in those Related Actions subject to the First-Round Motion to Dismiss only where the complaint is amended pursuant to Paragraph 8.3.

In the event Aon or AllianzGI Defendants intend to move to dismiss an amended complaint filed pursuant to Paragraph 8.3 or any complaint in a Later-Filed Related Action, the parties shall meet and confer no later than March 21, 2022 on (i) their respective positions on whether to propose suspending the Court’s pre-motion letter practice for motions to dismiss amended complaints; (ii) page limits; and (iii) the form of briefing, including approaches to coordinating motion practice to reduce the burden on the Court and the parties. The parties shall submit a joint report to the Court no later than March 31, 2022 with the parties’ agreements as to the topics addressed through their conferral, and, to the extent agreement is not reached, the parties’ joint report shall set out their areas of disagreement, not to exceed 5 pages double-spaced for Plaintiffs (collectively) and for each Defendant. The parties’ meet-and-confer obligation set out herein replaces any obligation in so-ordered stipulations in Later-Filed Related Actions to meet and confer regarding the application of the September 30 Order, AllianzGI Defendants’ intention to move to dismiss and/or a schedule for such motion for such Later-Filed Related Action.



**8.3 Amended Complaints.** Plan #3, ¶ 8.2 is vacated, except to the extent that it vacated ¶ 8 of Plan #1 and ¶ 8.1 of Plan #2. Any complaint in the Related Actions amended pursuant to the September 30 Order or any amended complaint in any Later-Filed Related Action, shall be filed on March 7, 2022. Amendments of the complaints in the Related Actions after March 7, 2022 shall be either with the opposing party's written consent or the Court's leave. Plaintiffs reserve their rights, if any, to amend under Fed. R. Civ. P. 15(a)(1).

**9.3 Answers.** Plan #3, ¶ 9.2 is vacated, except to the extent that it vacated ¶ 9 of Plan #1, as are any deadlines for Answers in so-ordered stipulations filed in any Related Action. The parties shall meet and confer no later than March 21, 2022 to set a deadline for Answers in all Related Actions.

Dated: February 18, 2022  
New York, NY

/s/ Hannah Ross

Hannah Ross  
Avi Josefson  
James Harrod  
Michael Blatchley  
BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP  
1251 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.  
Stephanie G. Wheeler  
Kathleen Suzanne McArthur  
Ann-Elizabeth Ostrager  
Hilary M. Williams  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2468  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588

*Co-Counsel for Plaintiffs Arkansas Teacher Retirement System; Christian Brothers Employee Retirement Plan, and Dan Stremel*

*Counsel for Defendant Allianz Global Investors U.S. LLC*

*Counsel for Plaintiffs Employees' Retirement System of the City of Milwaukee; Chicago & Vicinity Laborers' District Council Pension Fund and the Chicago & Vicinity Laborers' District Council Health & Welfare Fund, and Catherine Wenskus, Administrator; The Boards of Trustees for the Carpenters Health and Security Trust of Western Washington and for the Group Investment Trust of the Carpenters Individual Account Pension Trust of Western Washington; Carpenters Retirement Trust of Western Washington;*

/s/ Robert A. Skinner

Robert A. Skinner  
Amy D. Roy  
Mary Elizabeth Brust  
Cole A. Goodman  
ROPES & GRAY LLP  
Prudential Tower  
800 Boylston  
Boston, MA 02199  
Telephone: (617) 951-7000  
Facsimile: (617) 951-7050

Jared D. Giddens (jgiddens@cwlaw.com)  
*Pro hac vice*

*Co-Counsel for Defendant Allianz Global Investors U.S. LLC*

CONNER & WINTERS, LLP  
1700 One Leadership Square  
211 N. Robinson  
Oklahoma City, OK 73102  
Telephone: (405) 272-5711

*Co-Counsel for Plaintiffs Christian Brothers  
Employee Retirement Plan, and Dan Stremel*

/s/ Fredric S. Fox

Fredric S. Fox  
Donald R. Hall  
Melinda Campbell  
Aaron Schwartz  
KAPLAN FOX & KILSHEIMER LLP  
850 Third Avenue, 14th Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
Facsimile: (212) 687-7715

*Co-Counsel for Plaintiff Arkansas Teacher  
Retirement System*

*Co-Counsel for Plaintiffs Chicago Area I.B of T.  
Pension Plan & Trust and Local 703 I.B. of T.,  
Grocery and Food Employees' Pension Plan &  
Trust*

*Counsel for Plaintiff Texas Treasury  
Safekeeping Trust Company*

/s/ David S. Golub

David S. Golub  
Steven L. Bloch  
Ian W. Sloss  
SILVER GOLUB & TEITELL LLP  
184 Atlantic Street  
Stamford, CT 06901  
Telephone: (203) 325-4491  
Facsimile: (203) 325-3769

*Counsel for Plaintiffs Retirement Program  
for Employees of the Town of Fairfield,  
Retirement Program for Fairfield Police and  
Firemen's Retirement System, and the Board*

/s/ Renita Sharma

Richard Werder  
Michael Liftik  
Renita Sharma  
Andrew Marks  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
51 Madison Avenue  
22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212)-849-7100

*Counsel for Defendant Aon Investments USA  
Inc. f/k/a Aon Hewitt Investment Consulting,  
Inc.*

*of Trustees of the New England Health Care  
Employees Pension Fund, and New England  
Health Care Employees Pension Fund*

/s/ Jonathan L. Hochman

Jonathan L. Hochman  
Matthew A. Katz  
Jenny C. Gu  
SCHINDLER COHEN & HOCHMAN LLP  
100 Wall Street, 15th Floor  
New York, NY 10005  
Telephone: (212) 277-6300  
Facsimile: (212) 277-6333

*Counsel for Plaintiff Lehigh University*

/s/ William C. Fredericks

William C. Fredericks  
Donald A. Broggi  
Zachary M. Vaughan  
SCOTT + SCOTT ATTORNEYS AT LAW LLP  
The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: (212) 223-6444  
Facsimile: (212) 223-6334

*Counsel for Plaintiffs Teamster Members  
Retirement Plan f/k/a GCIU Inter-Local Pension  
Plan and Bricklayers and Masons' Local Union  
No. 5, Ohio Pension Fund*

/s/ Daniel Z. Goldman

Daniel Z. Goldman  
PETRILLO KLEIN & BOXER LLP  
655 Third Avenue, 22nd Floor  
New York, NY 10017  
Telephone: (212) 370-0330

/s/ Sean W. Gallagher

Sean W. Gallagher  
Adam L. Hoeflich  
Mark S. Ouweleen

Abby M. Mollen  
Nicolas L. Martinez  
Dawson K. Robinson  
BARTLIT BECK LLP  
54 West Hubbard Street, Suite 300  
Chicago, IL 60654  
Telephone: (312) 494-4400

*Counsel for Plaintiffs Blue Cross and Blue  
Shield Association National Employee  
Benefits Committee, Blue Cross and Blue  
Shield Association, Finance Committee of  
the Board of Directors of Blue Cross Blue  
Shield of Michigan, Blue Cross Blue Shield  
of Michigan Foundation, and Raytheon  
Technologies Corporation Pension  
Administration and Investment Committee*

/s/ Anthony F. Shelley  
Anthony F. Shelley  
MILLER & CHEVALIER CHARTERED  
900 Sixteenth Street N.W.  
Black Lives Matter Plaza  
Washington, DC 20006  
Telephone: (202) 626-5924

*Counsel for Plaintiffs Blue Cross and Blue  
Shield Association National Employee  
Benefits Committee*

/s/ Javier Bleichmar  
Javier Bleichmar  
George N. Bauer  
BLEICHMAR FONTI & AULD LLP  
7 Times Square, 27th Floor  
New York, New York 10036  
Telephone: (212) 789-1340  
Facsimile: (212) 205-3960

*Counsel for Plaintiffs Metropolitan  
Transportation Authority Defined Benefit  
Pension Plan Master Trust, Manhattan and  
Bronx Surface Transit Operating Authority*

*Pension Plan, and Metropolitan Transportation Authority Other Postemployment Benefit Plan; and the Board of Trustees of the International Brotherhood of Electrical Workers, Local No. 38 Pension Fund Pension Plan*

/s/ Regina Calcaterra

Regina Calcaterra  
Justin Teres  
CALCATERRA POLLACK LLP  
1140 Avenue of the Americas, 9th Floor  
New York, New York 10036  
Telephone: (212) 899-1760  
*Counsel for Plaintiffs Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Manhattan and Bronx Surface Transit Operating Authority Pension Plan, and Metropolitan Transportation Authority Other Postemployment Benefit Plan*

/s/ Scott F. Hessel

Scott F. Hessel  
John Bjork  
Ashima Talwar  
Sperling & Slater, P.C.  
55 West Monroe Street, Suite 3200  
Chicago, Illinois 60603  
Telephone: (312) 641-3200  
*Co-Counsel for Plaintiffs Chicago Area I.B. of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust*

/s/ Justin S. Brooks

Justin S. Brooks  
Elizabeth H. Shofner  
Reuben A. Guttman  
GUTTMAN, BUSCHNER & BROOKS  
PLLC  
119 Coulter Ave., Suite 211  
Ardmore, PA 19003  
Telephone: (610) 547-9556

/s/ Jonathan D. Karmel

Jonathan D. Karmel  
KARMEL LAW FIRM  
221 N. La Salle Street, Suite 1550  
Chicago, IL 60601  
Telephone: (800) 459-6264

/s/ Kenneth A. Wexler

Kenneth A. Wexler  
Mark J. Tamblyn  
WEXLER WALLACE LLP  
55 W. Monroe Street, Suite 3300  
Chicago, IL 60603  
Telephone: (312) 346-2222

*Co-Counsel for Plaintiffs Paul Schaefer, Robert  
O'Toole, Marc Parker, Brian Jordan, Mark  
Jacobs, and William R. Seehafer, as trustees of  
the United Food & Commercial Workers  
Unions & Employers Midwest Pension Fund,  
on behalf of the Plan*

/s/ Brian D. Melton

Brian D. Melton  
Vineet Bhatia  
Ryan T. Weiss  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Phone: (713) 651-9366

Steven G. Sklaver  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Phone: (310) 789-3100

Shawn J. Rabin  
Lisa Jing  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019-6023  
Phone: (212) 336-8330

*Counsel for Plaintiff Marco Consulting Group  
Trust I*

/s/ Bradley J. Bondi

Bradley J. Bondi  
Kevin Snell  
Grace McAllister  
CAHILL GORDON & REINDEL LLP  
32 Old Slip  
New York, NY 10005  
Telephone: (212) 701-3000

*Counsel for Plaintiffs University Health, Inc.,  
Southeast Georgia Health System, Inc.,  
University Medical Associates of the Medical  
University of South Carolina (d/b/a MUSC  
Physicians), Vizient Southern States, Inc.,  
Phoenix Health Care Management Services,  
Inc., and Halifax Regional Medical Center  
Employees' Pension Plan*

/s/ David S. Preminger

David S. Preminger  
KELLER ROHRBACK L.L.P.  
1140 Sixth Avenue, 9th Floor  
New York, NY 10036  
Tel.: (646) 380-6690

Erin M. Riley  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: 206-623-1900

Jeffrey Lewis  
KELLER ROHRBACK L.L.P.  
180 Grand Avenue, Suite 1380  
Oakland, CA 94612  
Tel.: (510) 463-3900

Gary A. Gotto  
KELLER ROHRBACK L.L.P.  
3101 N. Central Ave., Suite 1400  
Phoenix, AZ. 85012  
Tel.: (602) 230-6322

*Counsel for Plaintiff Alaska Laborers-  
Employers Retirement Fund*

/s/ John Briody

John Briody (jbriody@mckoolsmith.com)  
MCKOOL SMITH, P.C.  
One Manhattan West  
395 9th Avenue, 50th Floor  
New York, New York 10001  
Telephone: (415) 693-0700

J. Michael Hennigan  
(jhennigan@mckoolsmith.com)  
*Pro hac vice application forthcoming*  
Kirk D. Dillman (kdillman@mckoolsmith.com)

*Pro hac vice*  
M. Storm Byrd (sbyrd@mckoolsmith.com)  
*Pro hac vice*  
MCKOOL SMITH, P.C.  
300 South Grand Avenue, Suite 2900  
Los Angeles, California 90071  
Telephone: (213) 694-1200

*Counsel for Plaintiff Board of Trustees of the  
San Diego County Construction Laborers'  
Pension Trust Fund*

The Clerk of Court is directed to file this case management plan in all of the Related Actions listed in the caption above.

Dated: February 18, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE